

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

Brattleboro Housing Authority Plan

5 Year Plan for Fiscal Years 2001 - 2005

Annual Plan for Fiscal Year 2001

**NOTE: THIS PHA PLANS TEMPLATE (HUD 50075) IS TO BE COMPLETED IN
ACCORDANCE WITH INSTRUCTIONS LOCATED IN APPLICABLE PIH NOTICES**

PHA Plan Agency Identification

PHA Name: Brattleboro Housing Authority

PHA Number: VT002

PHA Fiscal Year Beginning: (mm/yyyy) 04/2001

Public Access to Information

Information regarding any activities outlined in this plan can be obtained by contacting: (select all that apply)

- ☒ Main administrative office of the PHA
- ☐ PHA development management offices
- ☐ PHA local offices

Display Locations For PHA Plans and Supporting Documents

The PHA Plans (including attachments) are available for public inspection at: (select all that apply)

- ☒ Main administrative office of the PHA
- ☐ PHA development management offices
- ☐ PHA local offices
- ☐ Main administrative office of the local government
- ☐ Main administrative office of the County government
- ☐ Main administrative office of the State government
- ☐ Public library
- ☐ PHA website
- ☐ Other (list below)

PHA Plan Supporting Documents are available for inspection at: (select all that apply)

- ☒ Main business office of the PHA
- ☐ PHA development management offices
- ☐ Other (list below)

5-YEAR PLAN
PHA FISCAL YEARS 2000 - 2004
[24 CFR Part 903.5]

A. Mission

State the PHA's mission for serving the needs of low-income, very low income, and extremely low-income families in the PHA's jurisdiction. (select one of the choices below)

- ☐ The mission of the PHA is the same as that of the Department of Housing and Urban Development: To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.
- X The PHA's mission is: (state mission here) To ensure the provision of quality affordable housing opportunities in viable communities for lower income households.

B. Goals [All are at the end of the section]

The goals and objectives listed below are derived from HUD's strategic Goals and Objectives and those emphasized in recent legislation. PHAs may select any of these goals and objectives as their own, or identify other goals and/or objectives. Whether selecting the HUD-suggested objectives or their own, **PHAS ARE STRONGLY ENCOURAGED TO IDENTIFY QUANTIFIABLE MEASURES OF SUCCESS IN REACHING THEIR OBJECTIVES OVER THE COURSE OF THE 5 YEARS.** (Quantifiable measures would include targets such as: numbers of families served or PHAS scores achieved.) PHAs should identify these measures in the spaces to the right of or below the stated objectives.

HUD Strategic Goal: Increase the availability of decent, safe, and affordable housing.

- ☐ PHA Goal: Expand the supply of assisted housing
Objectives:
- ☐ Apply for additional rental vouchers:
 - ☐ Reduce public housing vacancies:
 - ☐ Leverage private or other public funds to create additional housing opportunities:
 - ☐ Acquire or build units or developments
 - ☐ Other (list below)
- ☐ PHA Goal: Improve the quality of assisted housing
Objectives:
- ☐ Improve public housing management: (PHAS score)
 - ☐ Improve voucher management: (SEMAP score)
 - ☐ Increase customer satisfaction:
 - ☐ Concentrate on efforts to improve specific management functions: (list; e.g., public housing finance; voucher unit inspections)
 - ☐ Renovate or modernize public housing units:

- ☐ Demolish or dispose of obsolete public housing:
- ☐ Provide replacement public housing:
- ☐ Provide replacement vouchers:
- ☐ Other: (list below)

☐ PHA Goal: Increase assisted housing choices

Objectives:

- ☐ Provide voucher mobility counseling:
- ☐ Conduct outreach efforts to potential voucher landlords
- ☐ Increase voucher payment standards
- ☐ Implement voucher homeownership program:
- ☐ Implement public housing or other homeownership programs:
- ☐ Implement public housing site-based waiting lists:
- ☐ Convert public housing to vouchers:
- ☐ Other: (list below)

HUD Strategic Goal: Improve community quality of life and economic vitality

☐ PHA Goal: Provide an improved living environment

Objectives:

- ☐ Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments:
- ☐ Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments:
- ☐ Implement public housing security improvements:
- ☐ Designate developments or buildings for particular resident groups (elderly, persons with disabilities)
- ☐ Other: (list below)

HUD Strategic Goal: Promote self-sufficiency and asset development of families and individuals

☐ PHA Goal: Promote self-sufficiency and asset development of assisted households

Objectives:

- ☐ Increase the number and percentage of employed persons in assisted families:
- ☐ Provide or attract supportive services to improve assistance recipients' employability:

- ☐ Provide or attract supportive services to increase independence for the elderly or families with disabilities.
- ☐ Other: (list below)

HUD Strategic Goal: Ensure Equal Opportunity in Housing for all Americans

- ☐ PHA Goal: Ensure equal opportunity and affirmatively further fair housing Objectives:
 - ☐ Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability:
 - ☐ Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability:
 - ☐ Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required:
 - ☐ Other: (list below)

Other PHA Goals and Objectives: (list below)

Resident Relations, Services and Involvement

Goal: *To continue to build partnerships with residents, involving them in every aspect of BHA business to the extent they are willing and able.*

Objectives: Facilitate the development and provide ongoing support to sustain tenant associations throughout all BHA properties.

Network throughout the community/collaborate to maximize services for resident of BHA. Continue working with those in education, welfare to work, youth services and other programs and service providers.

Maintain the Hope in Housing and AmeriCorps Programs as long as feasible.

Continue to work towards including a resident on the Board.

Transition the Family Self Sufficiency Program into the regular Section 8 program following new regulations.

Integrate Section 8 participants into appropriate programs to the extent they are willing and able.

Progress statement: *Re-organized staffing so that there is a staff person for family housing and one for elderly/ disabled housing. *Very active AmeriCorp program. *Conducted the summer food program in family housing in combination with Welfare to Work. Continued to strengthen relationships with area service providers. Maintained the Hope in Housing Program. Outreach to encourage a resident to join the Board.

Community Relations/Involvement

Goal: *To be a responsible and active member of the greater Brattleboro community with respect to housing.*

Objectives: Make ourselves known a little more within the community. Meet with Selectmen and other groups involved with housing needs.

Explore ways in which BHA can join with the community of Brattleboro in pursuing housing needs.

Try to serve those most in need while meeting the federal obligations of the Authority.

Progress statement: Met with Selectmen. Continue to serve on various Town and Regional Committees. BHA may be taking over administration of the Shelter Plus Care Program in November.

Management

Goals: Manage the Authority's programs in an efficient and effective manner applying sound management principles to the organization.

Manage the BHA's compliance with the enormous changes from HUD and Congress.

Objectives: Continuously revise all aspects of the Authority's operations in response to HUD mandates. Maintain a standard performer rating under the new Public Housing Assessment System and Section 8 Management Assessment Program .

Provide adequate training for staff to fulfill new HUD requirements through support of ongoing staff development goals.

Educate the Board on new laws and regulations.

Revise PHA and Section 8 administrative policies to conform to the new law. Review yearly, preferences should be reviewed by October 1 of 2000.

Progress statement: Continuously trying to keep up with HUD mandates and micro-management. Staff and Commissioners have attended many training sessions. Y2K passed successfully.

Marketability

Goal: Enhance the marketability of the BHA public housing stock.

Objectives: Determine what needs to be done so that the efficiency units can and will be used at Hayes Court: perform a market analysis, propose alternative solutions and implement at least one.

Develop asset management plan for all properties.

Set flat rent for all properties.

Progress statement: Effectively utilizing Comp Grant funds to improve marketability. Flat rent in place. Asset management plan underway with new Comp Grant 5 year plan and development specific accounting. Architect drawing up plans for Hayes Court elevator to be installed summer of 2001.

Security

Goal: *Continue to strive for a safe and secure environment in the BHA public housing developments.*

Objectives: Review our security needs in all developments- do we have what we need to make residents feel safe and secure?

Continue AmeriCorps Program in partnership with the Land Trust as long as viable.

Continue to work closely with the Brattleboro Police Department and Windham County Sheriff's Department. In addition to other mechanisms and communications, sustain the contract for patrols, access to BHA offices and weekly activity logs.

Progress statement: AmeriCorp continues to be a strong and effective program to give our youth positive alternative activities in their neighborhoods. Security needs are assessed and reviewed regularly. We continue to maintain our close working relationship with the local police including frequent discussions over matters and receipt of weekly logs.

Maintenance

Goals: *Maintain the BHA public housing stock in a decent and sanitary condition.*

Objectives: Remain current on Comp Grant filings, obligations and expenditures and other program requirements.

Cut total turn around time for apartments to 30 days.

Progress statement: Community room at Moore Court is open and active. We remain very current on all Comp Grant requirements. Turnaround time and vacancy issues have been of paramount concern and they have been reduced significantly this year.

Our Annual Plan is based on the premise that if we accomplish our goals and objectives we will be working towards the achievement of our mission.

Plan continues below.

Annual PHA Plan
PHA Fiscal Year 2000
[24 CFR Part 903.7]

i. Annual Plan Type:

Select which type of Annual Plan the PHA will submit.

☒ **Standard Plan**

Streamlined Plan:

- ☐ **High Performing PHA**
- ☐ **Small Agency (<250 Public Housing Units)**
- ☐ **Administering Section 8 Only**

☐ **Troubled Agency Plan**

ii. Executive Summary of the Annual PHA Plan

[24 CFR Part 903.7 9 (r)]

Provide a brief overview of the information in the Annual Plan, including highlights of major initiatives and discretionary policies the PHA has included in the Annual Plan.

The Brattleboro Housing Authority has prepared this Agency Plan in compliance with Section 511 of the Quality Housing and Work Responsibility Act of 1998 and the ensuing HUD requirements.

We have adopted the following mission statement to guide the activities of the Brattleboro Housing Authority.

To ensure the provision of quality affordable housing opportunities in viable communities for lower income households.

We have also adopted the following goals and objectives for the next five years.

Resident Relations, Services and Involvement

Goal: *To continue to build partnerships with residents, involving them in every aspect of BHA business to the extent they are willing and able.*

Objectives: Facilitate the development and provide ongoing support to sustain tenant associations throughout all BHA properties.

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Our Annual Plan is based on the premise that if we accomplish our goals and objectives we will be working towards the achievement of our mission.

iii. Annual Plan Table of Contents

[24 CFR Part 903.7 9 (r)]

Provide a table of contents for the Annual Plan, including attachments, and a list of supporting documents available for public inspection.

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Attachments

Indicate which attachments are provided by selecting all that apply. Provide the attachment's name (A, B, etc.) in the space to the left of the name of the attachment. Note: If the attachment is provided as a **SEPARATE** file submission from the PHA Plans file, provide the file name in parentheses in the space to the right of the title.

Required Attachments: **Are included in this plan.**

- X Admissions Policy for Deconcentration **page 56**
- X FY 2001 Capital Fund Program Annual Statement **page 30**
- ☐ Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)

Optional Attachments: **Are included in this plan.**

- X PHA Management Organizational Chart **page 56**
- X FY 2001 Capital Fund Program 5 Year Action Plan **page 35**
- ☐ Public Housing Drug Elimination Program (PHDEP) Plan
- X Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text) **page 53**
- ☐ Other (List below, providing each attachment name)

Supporting Documents Available for Review

Indicate which documents are available for public review by placing a mark in the “Applicable & On Display” column in the appropriate rows. All listed documents must be on display if applicable to the program activities conducted by the PHA.

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
X	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans
X	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions’ initiatives to affirmatively further fair housing that require the PHA’s involvement.	5 Year and Annual Plans
X	Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments to Fair Housing Choice (AI)) and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs
X	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources;
X	Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public Housing Deconcentration and Income Mixing	Annual Plan: Eligibility,

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
	Documentation: 1. PHA board certifications of compliance with deconcentration requirements (section 16(a) of the US Housing Act of 1937, as implemented in the 2/18/99 <i>Quality Housing and Work Responsibility Act Initial Guidance; Notice</i> and any further HUD guidance) and 2. Documentation of the required deconcentration and income mixing analysis	Selection, and Admissions Policies
X	Public housing rent determination policies, including the methodology for setting public housing flat rents X check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Schedule of flat rents offered at each public housing development X check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies X check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
X	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation)	Annual Plan: Operations and Maintenance
X	Public housing grievance procedures X check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
X	Section 8 informal review and hearing procedures X check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
X	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year	Annual Plan: Capital Needs
	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant	Annual Plan: Capital Needs
	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option)	Annual Plan: Capital Needs
	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing	Annual Plan: Capital Needs
	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
X	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act	Annual Plan: Conversion of Public Housing
	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
	Policies governing any Section 8 Homeownership program <input type="checkbox"/> check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
X	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency
	The most recent Public Housing Drug Elimination Program (PHDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan)	Annual Plan: Safety and Crime Prevention
X	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
	Other supporting documents (optional) (list individually; use as many lines as necessary)	(specify as needed)

1. Statement of Housing Needs

[24 CFR Part 903.7 9 (a)]

A. Housing Needs of Families in the Jurisdiction/s Served by the PHA

Based upon the information contained in the Consolidated Plan/s applicable to the jurisdiction, and/or other data available to the PHA, provide a statement of the housing needs in the jurisdiction by completing the following table. In the "Overall" Needs column, provide the estimated number of renter families that have housing needs. For the remaining characteristics, rate the impact of that factor on the housing needs for each family type, from 1 to 5, with 1 being "no impact" and 5 being "severe impact." Use N/A to indicate that no information is available upon which the PHA can make this assessment.

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Loca-tion
Income <= 30% of AMI	See Below	4	4	3	2	No Data	1

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford- ability	Supply	Quality	Access- ibility	Size	Loca- tion
Income >30% but <=50% of AMI	1904	4	4	3	2	No Data	1
Income >50% but <80% of AMI	See Above	3	4	3	2	No Data	1
Elderly	3	3	3	3	3	No Data	1
Families with Disabilities	4	4	4	3	3	No Data	1
Race/Ethnicity							
Race/Ethnicity							
Race/Ethnicity							
Race/Ethnicity							

What sources of information did the PHA use to conduct this analysis? (Check all that apply; all materials must be made available for public inspection.)

- ☒ Consolidated Plan of the Jurisdiction/s
Indicate year: July 2000
- ☐ U.S. Census data: the Comprehensive Housing Affordability Strategy (“CHAS”) dataset
- ☐ American Housing Survey data
Indicate year:
- ☐ Other housing market study
Indicate year:
- ☐ Other sources: (list and indicate year of information)

B. Housing Needs of Families on the Public Housing and Section 8 Tenant- Based Assistance Waiting Lists

State the housing needs of the families on the PHA’s waiting list/s. **Complete one table for each type of PHA-wide waiting list administered by the PHA.** PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

Housing Needs of Families on the Waiting List			
Waiting list type: (select one)			
X Section 8 tenant-based assistance			
<input type="checkbox"/> Public Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	125		
Extremely low income <=30% AMI	95	76%	
Very low income (>30% but <=50% AMI)	30	24%	
Low income (>50% but <80% AMI)	0	0	
Families with children	79	63%	
Elderly families	36	29%	
Families with Disabilities	36	29%	
Black	2	2%	
Hispanic	0	0	
Indian	1	.8%	
Asian	1	.8%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	46	37%	
2 BR	53	42%	
3 BR	24	19%	
4 BR	2	2%	
5 BR			
5+ BR			

Housing Needs of Families on the Waiting List
<p>Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes</p> <p>If yes:</p> <p>How long has it been closed (# of months)? 30</p> <p>Does the PHA expect to reopen the list in the PHA Plan year? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes</p> <p>Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes</p>

Housing Needs of Families on the Waiting List			
<p>Waiting list type: (select one)</p> <p><input type="checkbox"/> Section 8 tenant-based assistance</p> <p><input checked="" type="checkbox"/> Public Housing</p> <p><input type="checkbox"/> Combined Section 8 and Public Housing</p> <p><input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)</p> <p>If used, identify which development/subjurisdiction:</p>			
	# of families	% of total families	Annual Turnover
Waiting list total	114		
Extremely low income <=30% AMI	55	48%	
Very low income (>30% but <=50% AMI)	49	43%	
Low income (>50% but <80% AMI)	10	9%	
Families with children	58	51%	
Elderly families	52	46%	
Families with Disabilities	16	14%	
Black	4	3.5%	
Hispanic	0	0	
Asian	1	.8%	
Race/ethnicity			
Characteristics by Bedroom Size (Public Housing Only)			
1BR	54	47%	
2 BR	49	43%	

Housing Needs of Families on the Waiting List			
3 BR	10	9%	
4 BR	1	1%	
5 BR			
5+ BR			
Is the waiting list closed (select one)? X No <input type="checkbox"/> Yes If yes: How long has it been closed (# of months)? Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes			

C. Strategy for Addressing Needs

Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list **IN THE UPCOMING YEAR**, and the Agency's reasons for choosing this strategy.

(1) Strategies

Need: Shortage of affordable housing for all eligible populations

Strategy 1. Maximize the number of affordable units available to the PHA within its current resources by:

Select all that apply

- X Employ effective maintenance and management policies to minimize the number of public housing units off-line
- X Reduce turnover time for vacated public housing units
- X Reduce time to renovate public housing units
- ☐ Seek replacement of public housing units lost to the inventory through mixed finance development
- ☐ Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
- X Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- ☐ Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required
- ☐ Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- ☐ Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- X Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- ☐ Other (list below)

Strategy 2: Increase the number of affordable housing units by:

Select all that apply

- ☐ Apply for additional section 8 units should they become available
- ☐ Leverage affordable housing resources in the community through the creation of mixed - finance housing
- ☐ Pursue housing resources other than public housing or Section 8 tenant-based assistance.
- X Other: (list below)

Continue to support the Brattleboro Community Land Trust's development efforts and participate in community organizations and boards that promote creation or retention of affordable housing.

Need: Specific Family Types: Families at or below 30% of median**Strategy 1: Target available assistance to families at or below 30 % of AMI**

Select all that apply

- ☐ Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing
- ☐ Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance
- ☐ Employ admissions preferences aimed at families with economic hardships
- X Adopt rent policies to support and encourage work
- ☐ Other: (list below)

Need: Specific Family Types: Families at or below 50% of median**Strategy 1: Target available assistance to families at or below 50% of AMI**

Select all that apply

- ☐ Employ admissions preferences aimed at families who are working
- X Adopt rent policies to support and encourage work
- ☐ Other: (list below)

Need: Specific Family Types: The Elderly**Strategy 1: Target available assistance to the elderly:**

Select all that apply

- ☐ Seek designation of public housing for the elderly
- ☐ Apply for special-purpose vouchers targeted to the elderly, should they become available
- ☐ Other: (list below)

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

Select all that apply

- ☐ Seek designation of public housing for families with disabilities
- ☒ Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing
- ☐ Apply for special-purpose vouchers targeted to families with disabilities, should they become available
- ☐ Affirmatively market to local non-profit agencies that assist families with disabilities
- ☐ Other: (list below)

Need: Specific Family Types: Races or ethnicities with disproportionate housing needs

Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:

Select if applicable

- ☐ Affirmatively market to races/ethnicities shown to have disproportionate housing needs
- ☐ Other: (list below)

Strategy 2: Conduct activities to affirmatively further fair housing

Select all that apply

- ☐ Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- ☐ Market the section 8 program to owners outside of areas of poverty /minority concentrations
- ☐ Other: (list below)

Other Housing Needs & Strategies: (list needs and strategies below)

(2) Reasons for Selecting Strategies

Of the factors listed below, select all that influenced the PHA's selection of the strategies it will pursue:

- ☒ Funding constraints
- ☒ Staffing constraints
- ☐ Limited availability of sites for assisted housing
- ☒ Extent to which particular housing needs are met by other organizations in the community

- X Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- X Influence of the housing market on PHA programs
- ☐ Community priorities regarding housing assistance
- ☐ Results of consultation with local or state government
- ☐ Results of consultation with residents and the Resident Advisory Board
- ☐ Results of consultation with advocacy groups
- ☐ Other: (list below)

2. Statement of Financial Resources

[24 CFR Part 903.7 9 (b)]

List the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year.

Note: the table assumes that Federal public housing or tenant based Section 8 assistance grant funds are expended on eligible purposes; therefore, uses of these funds need not be stated. For other funds, indicate the use for those funds as one of the following categories: public housing operations, public housing capital improvements, public housing safety/security, public housing supportive services, Section 8 tenant-based assistance, Section 8 supportive services or other.

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2000 grants)		
a) Public Housing Operating Fund	338,481	
b) Public Housing Capital Fund	374,823	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	731,436	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)		
g) Resident Opportunity and Self-Sufficiency Grants		
h) Community Development Block Grant		
i) HOME		
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (list below)		

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
3. Public Housing Dwelling Rental Income	815,800	
4. Other income (list below)		
4. Non-federal sources (list below)		
Supportive services-elderly	20,000	In-home services
Supportive services-families	15,000	Summer food program
Total resources	2,295,540	

3. PHA Policies Governing Eligibility, Selection, and Admissions

[24 CFR Part 903.7 9 (c)]

A. Public Housing

Exemptions: PHAs that do not administer public housing are not required to complete subcomponent 3A.

(1) Eligibility

a. When does the PHA verify eligibility for admission to public housing? (select all that apply)

- X When families are within a certain number of being offered a unit: (state number)
☐ When families are within a certain time of being offered a unit: (state time)
☐ Other: (describe)

b. Which non-income (screening) factors does the PHA use to establish eligibility for admission to public housing (select all that apply)?

- X Criminal or Drug-related activity
X Rental history
X Housekeeping
☐ Other (describe)

- c. ☐ Yes X No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?
- d. ☐ Yes X No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?
- e. ☐ Yes X No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source)

The BHA obtains all relevant court records

(2)Waiting List Organization

- a. Which methods does the PHA plan to use to organize its public housing waiting list (select all that apply)

- X Community-wide list
- ☐ Sub-jurisdictional lists
- ☐ Site-based waiting lists
- ☐ Other (describe)

- b. Where may interested persons apply for admission to public housing?

- X PHA main administrative office
- ☐ PHA development site management office
- X Other (list below)

Applications are mailed upon request and available at human service agencies throughout the community.

- c. If the PHA plans to operate one or more site-based waiting lists in the coming year, answer each of the following questions; if not, skip to subsection **(3) Assignment**

1. How many site-based waiting lists will the PHA operate in the coming year?

2. ☐ Yes ☐ No: Are any or all of the PHA's site-based waiting lists new for the upcoming year (that is, they are not part of a previously-HUD-approved site based waiting list plan)?
If yes, how many lists?

3. ☐ Yes ☐ No: May families be on more than one list simultaneously
If yes, how many lists?

4. Where can interested persons obtain more information about and sign up to be on the site-based waiting lists (select all that apply)?

- ☐ PHA main administrative office
- ☐ All PHA development management offices
- ☐ Management offices at developments with site-based waiting lists
- ☐ At the development to which they would like to apply
- ☐ Other (list below)

(3) Assignment

a. How many vacant unit choices are applicants ordinarily given before they fall to the bottom of or are removed from the waiting list? (select one)

- ☐ One
☒ Two
☐ Three or More

b. ☒ Yes ☐ No: Is this policy consistent across all waiting list types?

c. If answer to b is no, list variations for any other than the primary public housing waiting list/s for the PHA:

(4) Admissions Preferences

a. Income targeting:

☐ Yes ☒ No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 40% of all new admissions to public housing to families at or below 30% of median area income?

b. Transfer policies:

In what circumstances will transfers take precedence over new admissions? (list below)

- ☒ Emergencies
☒ Overhoused
☒ Underhoused
☒ Medical justification
☒ Administrative reasons determined by the PHA (e.g., to permit modernization work)
☐ Resident choice: (state circumstances below)
☐ Other: (list below)

c. Preferences

1. ☒ Yes ☐ No: Has the PHA established preferences for admission to public housing (other than date and time of application)? (If “no” is selected, skip to subsection **(5) Occupancy**)

2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences:

- ☐ Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- ☐ Victims of domestic violence
- ☐ Substandard housing
- ☐ Homelessness
- ☐ High rent burden (rent is > 50 percent of income)

Other preferences: (select below)

- ☐ Working families and those unable to work because of age or disability
- ☐ Veterans and veterans' families
- X Residents who live and/or work in the jurisdiction
- ☐ Those enrolled currently in educational, training, or upward mobility programs
- ☐ Households that contribute to meeting income goals (broad range of incomes)
- ☐ Households that contribute to meeting income requirements (targeting)
- ☐ Those previously enrolled in educational, training, or upward mobility programs
- ☐ Victims of reprisals or hate crimes
- ☐ Other preference(s) (list below)

3. If the PHA will employ admissions preferences, please prioritize by placing a "1" in the space that represents your first priority, a "2" in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use "1" more than once, "2" more than once, etc.

2 Date and Time

Former Federal preferences:

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden

Other preferences (select all that apply)

- ☐ Working families and those unable to work because of age or disability
- ☐ Veterans and veterans' families
- 1 Residents who live and/or work in the jurisdiction
- ☐ Those enrolled currently in educational, training, or upward mobility programs
- ☐ Households that contribute to meeting income goals (broad range of incomes)
- ☐ Households that contribute to meeting income requirements (targeting)
- ☐ Those previously enrolled in educational, training, or upward mobility programs

- ☐ Victims of reprisals or hate crimes
- ☐ Other preference(s) (list below)

4. Relationship of preferences to income targeting requirements:

- ☐ The PHA applies preferences within income tiers
- X Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

(5) Occupancy

a. What reference materials can applicants and residents use to obtain information about the rules of occupancy of public housing (select all that apply)

- X The PHA-resident lease
- X The PHA's Admissions and (Continued) Occupancy policy
- X PHA briefing seminars or written materials
- X Other source (list)
On site staff.

b. How often must residents notify the PHA of changes in family composition? (select all that apply)

- X At an annual reexamination and lease renewal
- X Any time family composition changes
- X At family request for revision
- ☐ Other (list)

(6) Deconcentration and Income Mixing

a. ☐ Yes X No: Did the PHA's analysis of its family (general occupancy) developments to determine concentrations of poverty indicate the need for measures to promote deconcentration of poverty or income mixing?

b. ☐ Yes X No: Did the PHA adopt any changes to its **admissions policies** based on the results of the required analysis of the need to promote deconcentration of poverty or to assure income mixing?

c. If the answer to b was yes, what changes were adopted? (select all that apply)

- ☐ Adoption of site based waiting lists
If selected, list targeted developments below:

- ☐ Employing waiting list “skipping” to achieve deconcentration of poverty or income mixing goals at targeted developments
If selected, list targeted developments below:
- ☐ Employing new admission preferences at targeted developments
If selected, list targeted developments below:
- ☐ Other (list policies and developments targeted below)
- d. ☐ Yes X No: Did the PHA adopt any changes to **other** policies based on the results of the required analysis of the need for deconcentration of poverty and income mixing?
- e. If the answer to d was yes, how would you describe these changes? (select all that apply)
- ☐ Additional affirmative marketing
- ☐ Actions to improve the marketability of certain developments
- ☐ Adoption or adjustment of ceiling rents for certain developments
- ☐ Adoption of rent incentives to encourage deconcentration of poverty and income-mixing
- ☐ Other (list below)
- f. Based on the results of the required analysis, in which developments will the PHA make special efforts to attract or retain higher-income families? (select all that apply)
- X Not applicable: results of analysis did not indicate a need for such efforts
- ☐ List (any applicable) developments below:
- g. Based on the results of the required analysis, in which developments will the PHA make special efforts to assure access for lower-income families? (select all that apply)
- X Not applicable: results of analysis did not indicate a need for such efforts
- ☐ List (any applicable) developments below:

B. Section 8

Exemptions: PHAs that do not administer section 8 are not required to complete sub-component 3B.
Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).

(1) Eligibility

- a. What is the extent of screening conducted by the PHA? (select all that apply)
- X Criminal or drug-related activity only to the extent required by law or regulation

- ☐ Criminal and drug-related activity, more extensively than required by law or regulation
- ☐ More general screening than criminal and drug-related activity (list factors below)
- ☐ Other (list below)

- b. ☐ Yes X No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?
- c. ☐ Yes X No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?
- d. ☐ Yes X No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source)
- e. Indicate what kinds of information you share with prospective landlords? (select all that apply)
- X Criminal or drug-related activity
- ☐ Other (describe below)

(2) Waiting List Organization

- a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged? (select all that apply)
- X None
- ☐ Federal public housing
- ☐ Federal moderate rehabilitation
- ☐ Federal project-based certificate program
- ☐ Other federal or local program (list below)
- b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)
- X PHA main administrative office
- ☐ Other (list below)
- Applications are mailed and available at local human service agencies.

(3) Search Time

- a. X Yes ☐ No: Does the PHA give extensions on standard 60-day period to search for a unit?

If yes, state circumstances below: If more time is needed for any part of the process.

(4) Admissions Preferences

a. Income targeting

- ☐ Yes ☒ No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the section 8 program to families at or below 30% of median area income?

b. Preferences

1. ☒ Yes ☐ No: Has the PHA established preferences for admission to section 8 tenant-based assistance? (other than date and time of application) (if no, skip to subcomponent **(5) Special purpose section 8 assistance programs**)

2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences

- ☐ Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
☐ Victims of domestic violence
☐ Substandard housing
☐ Homelessness
☐ High rent burden (rent is > 50 percent of income)

Other preferences (select all that apply)

- ☐ Working families and those unable to work because of age or disability
☐ Veterans and veterans' families
☒ Residents who live and/or work in your jurisdiction
☐ Those enrolled currently in educational, training, or upward mobility programs
☐ Households that contribute to meeting income goals (broad range of incomes)
☐ Households that contribute to meeting income requirements (targeting)
☐ Those previously enrolled in educational, training, or upward mobility programs
☐ Victims of reprisals or hate crimes
☐ Other preference(s) (list below)

3. If the PHA will employ admissions preferences, please prioritize by placing a "1" in the space that represents your first priority, a "2" in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use "1" more than once, "2" more than once, etc.

2 Date and Time

Former Federal preferences

Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
Victims of domestic violence
Substandard housing
Homelessness
High rent burden

Other preferences (select all that apply)

- ☐ Working families and those unable to work because of age or disability
- ☐ Veterans and veterans' families
- 1 ☐ Residents who live and/or work in your jurisdiction
- ☐ Those enrolled currently in educational, training, or upward mobility programs
- ☐ Households that contribute to meeting income goals (broad range of incomes)
- ☐ Households that contribute to meeting income requirements (targeting)
- ☐ Those previously enrolled in educational, training, or upward mobility programs
- ☐ Victims of reprisals or hate crimes
- ☐ Other preference(s) (list below)

4. Among applicants on the waiting list with equal preference status, how are applicants selected? (select one)

- X ☒ Date and time of application
- ☐ Drawing (lottery) or other random choice technique

5. If the PHA plans to employ preferences for "residents who live and/or work in the jurisdiction" (select one)

- X ☒ This preference has previously been reviewed and approved by HUD
- ☐ The PHA requests approval for this preference through this PHA Plan

6. Relationship of preferences to income targeting requirements: (select one)

- X ☒ The PHA applies preferences within income tiers
- ☐ Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

(5) Special Purpose Section 8 Assistance Programs

a. In which documents or other reference materials are the policies governing eligibility, selection, and admissions to any special-purpose section 8 program administered by the PHA contained? (select all that apply)

- X ☒ The Section 8 Administrative Plan
- X ☒ Briefing sessions and written materials

☐ Other (list below)

b. How does the PHA announce the availability of any special-purpose section 8 programs to the public?

X Through published notices

☐ Other (list below)

4. PHA Rent Determination Policies

[24 CFR Part 903.7 9 (d)]

A. Public Housing

Exemptions: PHAs that do not administer public housing are not required to complete sub-component 4A.

(1) Income Based Rent Policies

Describe the PHA's income based rent setting policy/ies for public housing using, including discretionary (that is, not required by statute or regulation) income disregards and exclusions, in the appropriate spaces below.

a. Use of discretionary policies: (select one)

X The PHA will not employ any discretionary rent-setting policies for income based rent in public housing. Income-based rents are set at the higher of 30% of adjusted monthly income, 10% of unadjusted monthly income, the welfare rent, or minimum rent (less HUD mandatory deductions and exclusions). (If selected, skip to sub-component (2))

---or---

☐ The PHA employs discretionary policies for determining income based rent (If selected, continue to question b.)

b. Minimum Rent

1. What amount best reflects the PHA's minimum rent? (select one)

- ☐ \$0
☐ \$1-\$25
☐ \$26-\$50

2. ☐ Yes ☐ No: Has the PHA adopted any discretionary minimum rent hardship exemption policies?

3. If yes to question 2, list these policies below:

c. Rents set at less than 30% than adjusted income

1. ☐ Yes ☐ No: Does the PHA plan to charge rents at a fixed amount or percentage less than 30% of adjusted income?

2. If yes to above, list the amounts or percentages charged and the circumstances under which these will be used below:

d. Which of the discretionary (optional) deductions and/or exclusions policies does the PHA plan to employ (select all that apply)

☐ For the earned income of a previously unemployed household member

☐ For increases in earned income

☐ Fixed amount (other than general rent-setting policy)

If yes, state amount/s and circumstances below:

☐ Fixed percentage (other than general rent-setting policy)

If yes, state percentage/s and circumstances below:

☐ For household heads

☐ For other family members

☐ For transportation expenses

☐ For the non-reimbursed medical expenses of non-disabled or non-elderly families

☐ Other (describe below)

e. Ceiling rents

1. Do you have ceiling rents? (rents set at a level lower than 30% of adjusted income) (select one)

☐ Yes for all developments

☐ Yes but only for some developments

☐ No

2. For which kinds of developments are ceiling rents in place? (select all that apply)

☐ For all developments

- ☐ For all general occupancy developments (not elderly or disabled or elderly only)
- ☐ For specified general occupancy developments
- ☐ For certain parts of developments; e.g., the high-rise portion
- ☐ For certain size units; e.g., larger bedroom sizes
- ☐ Other (list below)

3. Select the space or spaces that best describe how you arrive at ceiling rents (select all that apply)

- ☐ Market comparability study
- ☐ Fair market rents (FMR)
- ☐ 95th percentile rents
- ☐ 75 percent of operating costs
- ☐ 100 percent of operating costs for general occupancy (family) developments
- ☐ Operating costs plus debt service
- ☐ The "rental value" of the unit
- ☐ Other (list below)

f. Rent re-determinations:

1. Between income reexaminations, how often must tenants report changes in income or family composition to the PHA such that the changes result in an adjustment to rent? (select all that apply)

- ☐ Never
- ☐ At family option
- ☐ Any time the family experiences an income increase
- ☐ Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold)_____
- ☐ Other (list below)

g. ☐ Yes ☐ No: Does the PHA plan to implement individual savings accounts for residents (ISAs) as an alternative to the required 12 month disallowance of earned income and phasing in of rent increases in the next year?

(2) Flat Rents

1. In setting the market-based flat rents, what sources of information did the PHA use to establish comparability? (select all that apply.)

- X The section 8 rent reasonableness study of comparable housing
- X Survey of rents listed in local newspaper

- ☒ Survey of similar unassisted units in the neighborhood
☐ Other (list/describe below)

B. Section 8 Tenant-Based Assistance

Exemptions: PHAs that do not administer Section 8 tenant-based assistance are not required to complete sub-component 4B. **Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

(1) Payment Standards

Describe the voucher payment standards and policies.

a. What is the PHA's payment standard? (select the category that best describes your standard)

- ☐ At or above 90% but below 100% of FMR
☒ 100% of FMR
☐ Above 100% but at or below 110% of FMR
☐ Above 110% of FMR (if HUD approved; describe circumstances below)

b. If the payment standard is lower than FMR, why has the PHA selected this standard? (select all that apply)

- ☐ FMRs are adequate to ensure success among assisted families in the PHA's segment of the FMR area
☐ The PHA has chosen to serve additional families by lowering the payment standard
☐ Reflects market or submarket
☐ Other (list below)

c. If the payment standard is higher than FMR, why has the PHA chosen this level? (select all that apply)

- ☐ FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area
☐ Reflects market or submarket
☐ To increase housing options for families
☐ Other (list below)

d. How often are payment standards reevaluated for adequacy? (select one)

- ☒ Annually
☐ Other (list below)

e. What factors will the PHA consider in its assessment of the adequacy of its payment standard? (select all that apply)

- X Success rates of assisted families
X Rent burdens of assisted families
X Other (list below)

(2) Minimum Rent

a. What amount best reflects the PHA's minimum rent? (select one)

- X \$0
☐ \$1-\$25
☐ \$26-\$50

b. ☐ Yes X No: Has the PHA adopted any discretionary minimum rent hardship exemption policies? (if yes, list below)

5. Operations and Management

[24 CFR Part 903.7 9 (e)]

Exemptions from Component 5: High performing and small PHAs are not required to complete this section. Section 8 only PHAs must complete parts A, B, and C(2)

A. PHA Management Structure

Describe the PHA's management structure and organization.

(select one)

- X An organization chart showing the PHA's management structure and organization is **on page 56**
☐ A brief description of the management structure and organization of the PHA follows:

B. HUD Programs Under PHA Management

List Federal programs administered by the PHA, number of families served at the beginning of the upcoming fiscal year, and expected turnover in each. (Use "NA" to indicate that the PHA does not operate any of the programs listed below.)

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	262	45
Section 8 Vouchers	109	25

Section 8 Certificates	10	All converted to Vouchers
Section 8 Mod Rehab		
Special Purpose Section 8 Certificates/Vouchers (list individually)	15	55 will be distributed by 4/1/01
Public Housing Drug Elimination Program (PHDEP)		
Other Federal Programs(list individually)		

C. Management and Maintenance Policies

List the PHA's public housing management and maintenance policy documents, manuals and handbooks that contain the Agency's rules, standards, and policies that govern maintenance and management of public housing, including a description of any measures necessary for the prevention or eradication of pest infestation (which includes cockroach infestation) and the policies governing Section 8 management.

- (1) Public Housing Maintenance and Management: (list below)
BHA Maintenance Policy; PHA Occupancy Policy; Lease
(2) Section 8 Management: (list below)
Section 8 Admissions and Management Policy

6. PHA Grievance Procedures

[24 CFR Part 903.7 9 (f)]

Exemptions from component 6: High performing PHAs are not required to complete component 6. Section 8-Only PHAs are exempt from sub-component 6A.

A. Public Housing

1. X Yes ☐ No: Has the PHA established any written grievance procedures in addition to federal requirements found at 24 CFR Part 966, Subpart B, for residents of public housing?

If yes, list additions to federal requirements below: Relevant chapter from policy starts on **page 57**

2. Which PHA office should residents or applicants to public housing contact to initiate the PHA grievance process? (select all that apply)

- X PHA main administrative office
X PHA development management offices
☐ Other (list below)

B. Section 8 Tenant-Based Assistance

1. X Yes ☐ No: Has the PHA established informal review procedures for applicants to the Section 8 tenant-based assistance program and informal hearing procedures for families assisted by the Section 8 tenant-based assistance program in addition to federal requirements found at 24 CFR 982?

If yes, list additions to federal requirements below: : Relevant chapter from policy starts on **page 57**.

2. Which PHA office should applicants or assisted families contact to initiate the informal review and informal hearing processes? (select all that apply)

- X PHA main administrative office
☐ Other (list below)

7. Capital Improvement Needs

[24 CFR Part 903.7 9 (g)]

Exemptions from Component 7: Section 8 only PHAs are not required to complete this component and may skip to Component 8.

A. Capital Fund Activities

Exemptions from sub-component 7A: PHAs that will not participate in the Capital Fund Program may skip to component 7B. All other PHAs must complete 7A as instructed.

(1) Capital Fund Program Annual Statement

Using parts I, II, and III of the Annual Statement for the Capital Fund Program (CFP), identify capital activities the PHA is proposing for the upcoming year to ensure long-term physical and social viability of its public housing developments. This statement can be completed by using the CFP Annual Statement tables provided in the table library at the end of the PHA Plan template **OR**, at the PHA's option, by completing and attaching a properly updated HUD-52837.

Select one:

☐ The Capital Fund Program Annual Statement is provided as an attachment to the PHA Plan at Attachment (state name)

-or-

X The Capital Fund Program Annual Statement is provided below: (if selected, copy the CFP Annual Statement from the Table Library and insert here)

PHA Plan Table Library

Component 7 Capital Fund Program Annual Statement Parts I, II, and II

Annual Statement

Capital Fund Program (CFP) Part I: Summary

Capital Fund Grant Number 002 FFY of Grant Approval: 10/2001

X Original Annual Statement

Line No.	Summary by Development Account	Total Estimated Cost
1	Total Non-CGP Funds	
2	1406 Operations	
3	1408 Management Improvements	15,000
4	1410 Administration	20,000
5	1411 Audit	
6	1415 Liquidated Damages	
7	1430 Fees and Costs	20,000
8	1440 Site Acquisition	
9	1450 Site Improvement	97,000
10	1460 Dwelling Structures	133,320
11	1465.1 Dwelling Equipment-Nonexpendable	30,400
12	1470 Nondwelling Structures	57,500
13	1475 Nondwelling Equipment	
14	1485 Demolition	
15	1490 Replacement Reserve	
16	1492 Moving to Work Demonstration	
17	1495.1 Relocation Costs	

18	1498 Mod Used for Development	
19	1502 Contingency	1,603
20	Amount of Annual Grant (Sum of lines 2-19)	374,823
21	Amount of line 20 Related to LBP Activities	
22	Amount of line 20 Related to Section 504 Compliance	55,000
23	Amount of line 20 Related to Security	36,720
24	Amount of line 20 Related to Energy Conservation Measures	8,000

Annual Statement

Capital Fund Program (CFP) Part II: Supporting Table

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
Melrose Terrace	Storm doors \$400/unit	1460	8000
	ADA renovation to kitchen	1470	20000
	Repair front porches	1460	10000
	Replace all refrigerators \$280/unit	1465	22400
Hayes Court	Install elevators for efficiency apts \$125,000/building pod	1460	75000
	New lights in community room	1470	2500
	ADA renovation to kitchen	1470	20000
	Upgrade landscaping	1450	10000
Moore Court	Deadbolts front and back	1460	6720
LedgeWood Heights	More lighting in parking lot	1450	2000
	Replace entry steps and stoops	1460	5600
	Replace fire extinguishers	1460	5000
	Exterior clapboards & stain buildings	1460	16000

	Apartment renovation	1460	7000
	Phase III drainage	1450	45000
Samuel Elliot Apts			
	Renovate kitchen	1470	15000
	Renovate parking lot	1450	40000
	Replace lobby call system	1465	8000

Annual Statement

Capital Fund Program (CFP) Part II: Supporting Table

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
Management Improvements			
	Community Safety Activities	1408	7500
	Youth Activities	1408	7500
Admin. Costs		1410	20000
Fees, Costs, Other		1430	20000
Contingency			1603

Annual Statement

Capital Fund Program (CFP) Part III: Implementation Schedule

Development Number/Name HA-Wide Activities	All Funds Obligated (Quarter Ending Date)	All Funds Expended (Quarter Ending Date)
Melrose Terrace	12/31/01	12/31/04
Hayes Court	12/31/01	12/31/04
Moore Court	12/31/01	12/31/04
Ledgewood	12/31/01	12/31/04
Elliot Apartments	12/31/01	12/31/04
Management Imp	12/31/01	12/31/04
Admin Costs	12/31/01	12/31/04
Fees, Costs, other	12/31/01	12/31/04
Contingency	12/31/01	12/31/04

(2) Optional 5-Year Action Plan

Agencies are encouraged to include a 5-Year Action Plan covering capital work items. This statement can be completed by using the 5 Year Action Plan table provided in the table library at the end of the PHA Plan template **OR** by completing and attaching a properly updated HUD-52834.

a. X Yes ☐ No: Is the PHA providing an optional 5-Year Action Plan for the Capital Fund? (if no, skip to sub-component 7B)

b. If yes to question a, select one:

☐ The Capital Fund Program 5-Year Action Plan is provided as an attachment to the PHA Plan at Attachment (state name

-or-

X The Capital Fund Program 5-Year Action Plan is provided below: (if selected, copy the CFP optional 5 Year Action Plan from the Table Library and insert here)

Optional Table for 5-Year Action Plan for Capital Fund (Component 7)

Printed: 11/16/2000
Information as of 11/14/00

Comp Grant and Operating Budget Capital Improvements for 2001 through 2005

Work Items	Budget Amount	2002	2003	2004	2005
Melrose Terrace					
Storm doors \$400/u unit	24,000	8,000	8,000		
Replace all stoves \$375/unit x 80	30,000	30,000			
Create parking@\$2000/space or re-paving lots	20,000		20,000		
Upgrade landscaping	10,000	10,000			
Replace and upgrade	15,000	15,000			

kitchen lighting
80 units 187.50/unit

Install curb cuts \$1500/cut x uts at sidewalk 12 cu next to road	18,000		18,000	
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Aphalt work for PHAS, seal cracks etc..	3,000			
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Total	63,000	28,000	18,000	0
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Work Items	Budget Amount	2002	2003	2004	2005

Hayes Court

Efficiency apts: install elevators \$125,00/building pod	375,000	50,000	125,000	
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Replace all CG refrigs \$280/unit	20,160	20,160		
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Replace all stoves \$375/unit	27,000	27,000		
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Replace all fire extinguishers	10,000		\$10,000	
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Create parking @\$2000/space or re-paving lots	8,000		8,000	
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Aphalt work for PHAS, seal cracks etc.. \$1500/yr	7,500			
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Add lights to emergency call system	5,400	5,400		
---	-------	-------	--	--

\$75.00/ door for
72 doors

Entry carpets \$60/entry for 19 entries	1,140	1,140			
---	-------	-------	--	--	--

Replace kitchen cabinets \$1,000/unit	62,000	20,000	20,000	20,000	
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Handicap thresholds all front drs front & back replace whole frame & repour stoops	80,000				
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Work Items	Budget	2002	2003	2004	2005
Paint all interior halls	11,000			11,000	
Paint all front porches	2,000				2,000
Total		102,560	164,140	31,000	22,000

Moore Court

Apartment renovations 3 units @\$5,000	15,000	15,000			
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Storage sheds \$600/unit	16,800	16,800			
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Upgrade basketball court	5,500			5,500	
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Replace all windows \$200/window installed Landmark windws	31,000				31,000
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Trim and upgrade landscaping	3,000	3,000			
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Tall fence along top of hill	5,000		5,000		
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Gutters over front entry \$150/unit	4,200	4,200			
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Tree work	\$1000/yr	5,000				
Fence repr	\$1000/yr	5,000				
Total			39,000	5,000	5,500	31,000

Work Items	Budget Amount	2002	2003	2004	2005
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Ledgewood Heights

Replace exterior clapboards & stain buildings	140,000	32,000	32,000	32,000	32,000
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To do all clapboards \$100,000. To stain all buildings \$40,000
Project is to be done by buiding with each building costing \$16,000

Apartment Renovation on turnover:	294,000	35,000	35,000	35,000	35,000
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To consist of the following-
~Renovate kitchens, counter tops and floors.
Total all units=\$136,500
~Replace lineolum upstairs at \$800/unitx42=\$33,600
~Replace accordian doors:\$225/door, 303 doors=\$68,175
Materials=\$5,700 Cost per unit=\$7,000
Labor=\$1,300

Improve insulation 9 buildings	\$7,000/bldg	63,000	14,000	14,000	14,000	21,000
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Add or repair storage \$2,000/unit 40units	80,000	20,000	20,000	20,000	20,000
2 buildings = 10units/year					
Rain diverters	2,200				

\$50/unit

New community room & expanded laundry room	100,000			100,000	
Upgrade basketball court	5,000				
Total		101,000	101,000	201,000	108,000

**Work
Items
Samuel Elliot
Apartments**

	Budget	2002	2003	2004	2005
Roof replacement	65,000				65,000
Paint halls	11,000				11,000
Paint balcony railings	10,000				10,000
Sprinkler expansion on turnover over 5 yrs Planning and permits \$3000 \$1,000 1br \$1,500 2 br	68,000	4,000	4,000	16,000	16,000
Total		4,000	4,000	16,000	102,000

**Managemet
Improvements**

Community Safety Activities	37,500	7,500	7,500	10,000	10,000
Youth Activities	37,500	7,500	7,500	10,000	10,000
Admin Costs Project Manager, computer, other	125,000	25,000	25,000	35,000	35,000
Fees/Costs/Other Permits, architect, engineers etc	125,000	25,000	25,000	30,000	30,000

Contingency reallocated by the end of each grant	263	7,683	18,323	26,823
Total	65,263	72,683	103,323	111,823
TOTAL ALL	374,823	374,823	374,823	374,823
Amount available	374,823	374,823	374,823	374,823
Difference	0	0	0	0

B. HOPE VI and Public Housing Development and Replacement Activities (Non-Capital Fund)

Applicability of sub-component 7B: All PHAs administering public housing. Identify any approved HOPE VI and/or public housing development or replacement activities not described in the Capital Fund Program Annual Statement.

- ☐ Yes X No: a) Has the PHA received a HOPE VI revitalization grant? (if no, skip to question c; if yes, provide responses to question b for each grant, copying and completing as many times as necessary)
- b) Status of HOPE VI revitalization grant (complete one set of questions for each grant)

1. Development name:
2. Development (project) number:
3. Status of grant: (select the statement that best describes the current status)
 - ☐ Revitalization Plan under development
 - ☐ Revitalization Plan submitted, pending approval
 - ☐ Revitalization Plan approved
 - ☐ Activities pursuant to an approved Revitalization Plan underway

- ☐ Yes X No: c) Does the PHA plan to apply for a HOPE VI Revitalization grant in the Plan year?
- If yes, list development name/s below:

- ☐ Yes X No: d) Will the PHA be engaging in any mixed-finance development activities for public housing in the Plan year?
- If yes, list developments or activities below:

- ☐ Yes X No: e) Will the PHA be conducting any other public housing development or replacement activities not discussed in the Capital Fund Program Annual Statement?
If yes, list developments or activities below:

8. Demolition and Disposition

[24 CFR Part 903.7 9 (h)]

Applicability of component 8: Section 8 only PHAs are not required to complete this section.

1. ☐ Yes X No: Does the PHA plan to conduct any demolition or disposition activities (pursuant to section 18 of the U.S. Housing Act of 1937 (42 U.S.C. 1437p)) in the plan Fiscal Year? (If “No”, skip to component 9; if “yes”, complete one activity description for each development.)

2. Activity Description

- ☐ Yes ☐ No: Has the PHA provided the activities description information in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 9. If “No”, complete the Activity Description table below.)

Demolition/Disposition Activity Description
1a. Development name:
1b. Development (project) number:
2. Activity type: Demolition <input type="checkbox"/> Disposition <input type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date application approved, submitted, or planned for submission: <u>(DD/MM/YY)</u>
5. Number of units affected:
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: b. Projected end date of activity:

9. Designation of Public Housing for Occupancy by Elderly Families or Families with Disabilities or Elderly Families and Families with Disabilities

[24 CFR Part 903.7 9 (i)]

Exemptions from Component 9; Section 8 only PHAs are not required to complete this section.

1. X Yes ☐ No: Has the PHA designated or applied for approval to designate or does the PHA plan to apply to designate any public housing for occupancy only by the elderly families or only by families with disabilities, or by elderly families and families with disabilities or will apply for designation for occupancy by only elderly families or only families with disabilities, or by elderly families and families with disabilities as provided by section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year? (If “No”, skip to component 10. If “yes”, complete one activity description for each development, unless the PHA is eligible to complete a streamlined submission; PHAs completing streamlined submissions may skip to component 10.)

2. Activity Description

- ☐ Yes X No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? If “yes”, skip to component 10. If “No”, complete the Activity Description table below.

Designation of Public Housing Activity Description
1a. Development name: Melrose Terrace 1b. Development (project) number: VT002001
2. Designation type: Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities X
3. Application status (select one) Approved; included in the PHA’s Designation Plan X Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation approved, submitted, or planned for submission: <u>12/28/99</u>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 80 7. Coverage of action (select one) <input type="checkbox"/> Part of the development X Total development

Designation of Public Housing Activity Description	
1a. Development name: Hayes Court	
1b. Development (project) number: VT002003	
2. Designation type:	
Occupancy by only the elderly <input type="checkbox"/>	
Occupancy by families with disabilities <input type="checkbox"/>	
Occupancy by only elderly families and families with disabilities	X
3. Application status (select one)	
Approved; included in the PHA's Designation Plan	X
Submitted, pending approval <input type="checkbox"/>	
Planned application <input type="checkbox"/>	
4. Date this designation approved, submitted, or planned for submission:	12/28/99
5. If approved, will this designation constitute a (select one)	
<input type="checkbox"/> New Designation Plan	
<input type="checkbox"/> Revision of a previously-approved Designation Plan?	
7. Number of units affected:	72
7. Coverage of action (select one)	
<input type="checkbox"/> Part of the development	
X Total development	
Designation of Public Housing Activity Description	
1a. Development name: Samuel Elliot Apartments	
1b. Development (project) number: VT002008	
2. Designation type:	
Occupancy by only the elderly <input type="checkbox"/>	
Occupancy by families with disabilities <input type="checkbox"/>	
Occupancy by only elderly families and families with disabilities	X
3. Application status (select one)	
Approved; included in the PHA's Designation Plan	X
Submitted, pending approval <input type="checkbox"/>	
Planned application <input type="checkbox"/>	
4. Date this designation approved, submitted, or planned for submission:	12/28/99
5. If approved, will this designation constitute a (select one)	
<input type="checkbox"/> New Designation Plan	
<input type="checkbox"/> Revision of a previously-approved Designation Plan?	
8. Number of units affected:	62
7. Coverage of action (select one)	
<input type="checkbox"/> Part of the development	
X Total development	

10. Conversion of Public Housing to Tenant-Based Assistance

[24 CFR Part 903.7 9 (j)]

Exemptions from Component 10; Section 8 only PHAs are not required to complete this section.

**A. Assessments of Reasonable Revitalization Pursuant to section 202 of the HUD
FY 1996 HUD Appropriations Act**

1. ☐ Yes ☒ No: Have any of the PHA's developments or portions of developments been identified by HUD or the PHA as covered under section 202 of the HUD FY 1996 HUD Appropriations Act? (If "No", skip to component 11; if "yes", complete one activity description for each identified development, unless eligible to complete a streamlined submission. PHAs completing streamlined submissions may skip to component 11.)

2. Activity Description

☐ Yes ☐ No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? If "yes", skip to component 11. If "No", complete the Activity Description table below.

Conversion of Public Housing Activity Description
1a. Development name: 1b. Development (project) number:
2. What is the status of the required assessment? <input type="checkbox"/> Assessment underway <input type="checkbox"/> Assessment results submitted to HUD <input type="checkbox"/> Assessment results approved by HUD (if marked, proceed to next question) <input type="checkbox"/> Other (explain below)
3. <input type="checkbox"/> Yes <input type="checkbox"/> No: Is a Conversion Plan required? (If yes, go to block 4; if no, go to block 5.)
4. Status of Conversion Plan (select the statement that best describes the current status) <input type="checkbox"/> Conversion Plan in development <input type="checkbox"/> Conversion Plan submitted to HUD on: (DD/MM/YYYY) <input type="checkbox"/> Conversion Plan approved by HUD on: (DD/MM/YYYY) <input type="checkbox"/> Activities pursuant to HUD-approved Conversion Plan underway
5. Description of how requirements of Section 202 are being satisfied by means other than conversion (select one) <input type="checkbox"/> Units addressed in a pending or approved demolition application (date submitted or approved: _____) <input type="checkbox"/> Units addressed in a pending or approved HOPE VI demolition application (date submitted or approved: _____) <input type="checkbox"/> Units addressed in a pending or approved HOPE VI Revitalization Plan (date submitted or approved: _____) <input type="checkbox"/> Requirements no longer applicable: vacancy rates are less than 10 percent

- ☐ Requirements no longer applicable: site now has less than 300 units
☐ Other: (describe below)

B. Reserved for Conversions pursuant to Section 22 of the U.S. Housing Act of 1937

C. Reserved for Conversions pursuant to Section 33 of the U.S. Housing Act of 1937

11. Homeownership Programs Administered by the PHA

[24 CFR Part 903.7 9 (k)]

A. Public Housing

Exemptions from Component 11A: Section 8 only PHAs are not required to complete 11A.

1. ☐ Yes X No: Does the PHA administer any homeownership programs administered by the PHA under an approved section 5(h) homeownership program (42 U.S.C. 1437c(h)), or an approved HOPE I program (42 U.S.C. 1437aaa) or has the PHA applied or plan to apply to administer any homeownership programs under section 5(h), the HOPE I program, or section 32 of the U.S. Housing Act of 1937 (42 U.S.C. 1437z-4). (If “No”, skip to component 11B; if “yes”, complete one activity description for each applicable program/plan, unless eligible to complete a streamlined submission due to **small PHA** or **high performing PHA** status. PHAs completing streamlined submissions may skip to component 11B.)

2. Activity Description

- ☐ Yes ☐ No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 12. If “No”, complete the Activity Description table below.)

**Public Housing Homeownership Activity Description
(Complete one for each development affected)**

1a. Development name:

1b. Development (project) number:

2. Federal Program authority:

- ☐ HOPE I
☐ 5(h)
☐ Turnkey III
☐ Section 32 of the USHA of 1937 (effective 10/1/99)

3. Application status: (select one) <input type="checkbox"/> Approved; included in the PHA's Homeownership Plan/Program <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission: (DD/MM/YYYY)
5. Number of units affected: 6. Coverage of action: (select one) <input type="checkbox"/> Part of the development <input type="checkbox"/> Total development

B. Section 8 Tenant Based Assistance

1. X Yes X No: Does the PHA plan to administer a Section 8 Homeownership program pursuant to Section 8(y) of the U.S.H.A. of 1937, as implemented by 24 CFR part 982 ? (If "No", skip to component 12; if "yes", describe each program using the table below (copy and complete questions for each program identified), unless the PHA is eligible to complete a streamlined submission due to high performer status. **High performing PHAs** may skip to component 12.)

2. Program Description: The HA will review the just published regulations and give careful consideration to program participation in FY2001.

a. Size of Program

☐ Yes ☐ No: Will the PHA limit the number of families participating in the section 8 homeownership option?

To be determined.

If the answer to the question above was yes, which statement best describes the number of participants? (select one)

- ☐ 25 or fewer participants
- ☐ 26 - 50 participants
- ☐ 51 to 100 participants
- ☐ more than 100 participants

b. PHA-established eligibility criteria

☐ Yes X No: Will the PHA's program have eligibility criteria for participation in its Section 8 Homeownership Option program in addition to HUD criteria?

If yes, list criteria below:

Capacity Statement: The financing for purchase of a home under the BHA Section 8 homeownership program will be provided, insured or guaranteed by the state or Federal government; or comply with secondary mortgage market underwriting requirements; or comply with generally accepted private sector underwriting standards.

The BHA program will be offered in collaboration with the homeownership center established by the Brattleboro Area Community Land Trust

12. PHA Community Service and Self-sufficiency Programs

[24 CFR Part 903.7 9 (1)]

Exemptions from Component 12: High performing and small PHAs are not required to complete this component. Section 8-Only PHAs are not required to complete sub-component C.

A. PHA Coordination with the Welfare (TANF) Agency

1. Cooperative agreements:

- ☐ Yes ☒ No: Has the PHA has entered into a cooperative agreement with the TANF Agency, to share information and/or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937)?

If yes, what was the date that agreement was signed? DD/MM/YY

2. Other coordination efforts between the PHA and TANF agency (select all that apply)

- ☒ Client referrals
☒ Information sharing regarding mutual clients (for rent determinations and otherwise)
☒ Coordinate the provision of specific social and self-sufficiency services and programs to eligible families
☐ Jointly administer programs
☐ Partner to administer a HUD Welfare-to-Work voucher program
☒ Joint administration of other demonstration program
☐ Other (describe)

B. Services and programs offered to residents and participants

(1) General

a. Self-Sufficiency Policies

Which, if any of the following discretionary policies will the PHA employ to enhance the economic and social self-sufficiency of assisted families in the following areas? (select all that apply)

- ☐ Public housing rent determination policies
☐ Public housing admissions policies
☐ Section 8 admissions policies
☐ Preference in admission to section 8 for certain public housing families

- ☐ Preferences for families working or engaging in training or education programs for non-housing programs operated or coordinated by the PHA
- ☐ Preference/eligibility for public housing homeownership option participation
- ☐ Preference/eligibility for section 8 homeownership option participation
- X Other policies (list below)
Preference for residents and/or Brattleboro employees.

b. Economic and Social self-sufficiency programs

X Yes ☐ No: Does the PHA coordinate, promote or provide any programs to enhance the economic and social self-sufficiency of residents? (If “yes”, complete the following table; if “no” skip to sub-component 2, Family Self Sufficiency Programs. The position of the table may be altered to facilitate its use.)

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
<i>Summer Food Program</i>	<i>8-10</i>	<i>Welfare to Work</i>	<i>Welfare to Work</i>	<i>Public Housing</i>
		Program	Program	
AmeriCorps Family and Youth Programs	8-10	Volunteers	Site offices	Public Housing

(2) Family Self Sufficiency program/s

a. Participation Description

Family Self Sufficiency (FSS) Participation

Program	Required Number of Participants (start of FY 2000 Estimate)	Actual Number of Participants (As of: 9/15/00)
Public Housing	The housing authority is ending The program as participants graduate.	1
Section 8	The housing authority is ending The program as participants graduate.	2

- b. ☐ Yes ☐ No: If the PHA is not maintaining the minimum program size required by HUD, does the most recent FSS Action Plan address the steps the PHA plans to take to achieve at least the minimum program size?

If no, list steps the PHA will take below:

The PHA is maintaining program size as required.

C. Welfare Benefit Reductions

1. The PHA is complying with the statutory requirements of section 12(d) of the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by: (select all that apply)

- X Adopting appropriate changes to the PHA's public housing rent determination policies and train staff to carry out those policies
- X Informing residents of new policy on admission and reexamination
- X Actively notifying residents of new policy at times in addition to admission and reexamination.
- ☐ Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services
- X Establishing a protocol for exchange of information with all appropriate TANF agencies
- ☐ Other: (list below)

D. Reserved for Community Service Requirement pursuant to section 12(c) of the U.S. Housing Act of 1937

Required Statement on Community Service Requirements:

The lease will be changed as of April 1, 2001.

Development of written description of services and written notification to residents regarding requirement or exempt status: Will be done in February of 2001. The form residents will fill out is part of the policy.

Cooperative Agreements with TANF agencies: Cooperative working arrangements are already in place.

The PHA will administer all aspects of the program.

Activities residents may participate: Residents may participate in a variety of programs offered through local human service agencies and the BHA Summer Food Program, AmeriCorps Program or other programs as they materialize.

BHA currently partners with a variety of local human service agencies in the provision of assistance and support to its residents. BHA will work with any local human service agency in order to offer its residents the broadest choice of alternatives to fulfill these requirements.

Process for curing non-compliance: Residents will have 12 months to cure non-compliance as stipulated in the federal regulations.

13. PHA Safety and Crime Prevention Measures

[24 CFR Part 903.7 9 (m)]

Exemptions from Component 13: High performing and small PHAs not participating in PHDEP and Section 8 Only PHAs may skip to component 15. High Performing and small PHAs that are participating in PHDEP and are submitting a PHDEP Plan with this PHA Plan may skip to sub-component D.

A. Need for measures to ensure the safety of public housing residents

1. Describe the need for measures to ensure the safety of public housing residents (select all that apply)

- ☐ High incidence of violent and/or drug-related crime in some or all of the PHA's developments
- ☐ High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the PHA's developments
- ☐ Residents fearful for their safety and/or the safety of their children
- X Observed lower-level crime, vandalism and/or graffiti
- ☐ People on waiting list unwilling to move into one or more developments due to perceived and/or actual levels of violent and/or drug-related crime
- X Other (describe below) Incidence of drug activity. Generalized community concerns for safety. Results from the HUD resident survey.

2. What information or data did the PHA used to determine the need for PHA actions to improve safety of residents (select all that apply).

- X Safety and security survey of residents
- ☐ Analysis of crime statistics over time for crimes committed "in and around" public housing authority
- ☐ Analysis of cost trends over time for repair of vandalism and removal of graffiti
- X Resident reports
- X PHA employee reports
- X Police reports
- X Demonstrable, quantifiable success with previous or ongoing anticrime/anti drug programs
- ☐ Other (describe below)

3. Which developments are most affected? (list below)

Ledgewood –drug activity

Moore Court- resident relations

All developments can benefit from attention to safety concerns as an on-going part of good management.

B. Crime and Drug Prevention activities the PHA has undertaken or plans to undertake in the next PHA fiscal year

1. List the crime prevention activities the PHA has undertaken or plans to undertake: (select all that apply)

- ☐ Contracting with outside and/or resident organizations for the provision of crime-and/or drug-prevention activities
- X Crime Prevention Through Environmental Design
- X Activities targeted to at-risk youth, adults, or seniors
- ☐ Volunteer Resident Patrol/Block Watchers Program
- ☐ Other (describe below)

2. Which developments are most affected? (list below)

Ledgewood and Moore receive more targeted programming.

We address safety issues as needed in each development.

C. Coordination between PHA and the police

1. Describe the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities: (select all that apply)

- X Police involvement in development, implementation, and/or ongoing evaluation of drug-elimination plan
- X Police provide crime data to housing authority staff for analysis and action
- ☐ Police have established a physical presence on housing authority property (e.g., community policing office, officer in residence)
- ☐ Police regularly testify in and otherwise support eviction cases
- X Police regularly meet with the PHA management and residents
- ☐ Agreement between PHA and local law enforcement agency for provision of above-baseline law enforcement services
- ☐ Other activities (list below)

2. Which developments are most affected? (list below)

All

D. Additional information as required by PHDEP/PHDEP Plan

PHAs eligible for FY 2000 PHDEP funds must provide a PHDEP Plan meeting specified requirements prior to receipt of PHDEP funds.

- ☐ Yes ☐ No: Is the PHA eligible to participate in the PHDEP in the fiscal year covered by this PHA Plan?
- ☐ Yes ☐ No: Has the PHA included the PHDEP Plan for FY 2000 in this PHA Plan?
- ☐ Yes ☐ No: This PHDEP Plan is an Attachment. (Attachment Filename: ____)

14. RESERVED FOR PET POLICY

[24 CFR Part 903.7 9 (n)]

Statement on the BHA pet policy which has been in effect since March 22, 1999 and fully complies with CFR960 Subpart G:

There is no security deposit required for dogs or cats or other common household pets. Residents are permitted one dog or two cats and an unlimited number of other common household pets. With respect to dogs and cats: the policy sets out standards on owner accountability; standard of care; rights of other tenants; vicious dogs and the following rules for pet ownership: Pet tag and collar; required information prior to pet residency; once the pet is on the premises; registration and visiting pets. Dogs are not permitted in Ledgewood or Moore Court because of the size and type of buildings, land area and density.

15. Civil Rights Certifications

[24 CFR Part 903.7 9 (o)]

Civil rights certifications are included in the PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations.

16. Fiscal Audit

[24 CFR Part 903.7 9 (p)]

1. X Yes ☐ No: Is the PHA required to have an audit conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))?
(If no, skip to component 17.)
2. X Yes ☐ No: Was the most recent fiscal audit submitted to HUD?
3. ☐ Yes X No: Were there any findings as the result of that audit?
4. ☐ Yes ☐ No: If there were any findings, do any remain unresolved?
If yes, how many unresolved findings remain?_____

5. ☐ Yes ☐ No: Have responses to any unresolved findings been submitted to HUD?
If not, when are they due (state below)?

17. PHA Asset Management

[24 CFR Part 903.7 9 (q)]

Exemptions from component 17: Section 8 Only PHAs are not required to complete this component. High performing and small PHAs are not required to complete this component.

1. ☐ Yes ☒ No: Is the PHA engaging in any activities that will contribute to the long-term asset management of its public housing stock , including how the Agency will plan for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs that have **not** been addressed elsewhere in this PHA Plan?
2. What types of asset management activities will the PHA undertake? (select all that apply)
- ☐ Not applicable
- ☐ Private management
- ☒ Development-based accounting
- ☒ Comprehensive stock assessment
- ☐ Other: (list below)
3. ☐ Yes ☒ No: Has the PHA included descriptions of asset management activities in the **optional** Public Housing Asset Management Table?

18. Other Information

[24 CFR Part 903.7 9 (r)]

A. Resident Advisory Board Recommendations

1. ☒ Yes ☐ No: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?
Only positive comments were received.
2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)
- ☐ Attached at Attachment (File name)
- ☒ Provided below:
The Committee unanimously felt the Plan was very complete and well done.
3. In what manner did the PHA address those comments? (select all that apply)

- X Considered comments, but determined that no changes to the PHA Plan were necessary.
- ☐ The PHA changed portions of the PHA Plan in response to comments
List changes below:
- ☐ Other: (list below)

Agency Plan Resident Review Committee Members: Hannah Bucossi and Virginia Wright Melrose Terrace; Merlin Bristol and Wallace Crowningshield Hayes Court; Bill Chamerlain and Francis Dawes Samuel Elliot Apartments; Patricia Davis Moore Court.

B. Description of Election process for Residents on the PHA Board

1. X Yes ☐ No: Does the PHA meet the exemption criteria provided section 2(b)(2) of the U.S. Housing Act of 1937? (If no, continue to question 2; if yes, skip to sub-component C.)
2. ☐ Yes ☐ No: Was the resident who serves on the PHA Board elected by the residents? (If yes, continue to question 3; if no, skip to sub-component C.)
3. Description of Resident Election Process
- a. Nomination of candidates for place on the ballot: (select all that apply)
- ☐ Candidates were nominated by resident and assisted family organizations
- ☐ Candidates could be nominated by any adult recipient of PHA assistance
- ☐ Self-nomination: Candidates registered with the PHA and requested a place on ballot
- ☐ Other: (describe)
- b. Eligible candidates: (select one)
- ☐ Any recipient of PHA assistance
- ☐ Any head of household receiving PHA assistance
- ☐ Any adult recipient of PHA assistance
- ☐ Any adult member of a resident or assisted family organization
- ☐ Other (list)
- c. Eligible voters: (select all that apply)
- ☐ All adult recipients of PHA assistance (public housing and section 8 tenant-based assistance)
- ☐ Representatives of all PHA resident and assisted family organizations
- ☐ Other (list)

Additional required information: Next opening on the Commission July 2001. Appointing authority: Brattleboro Board of Selectmen, Chairman Robert Fagelson

The opening on the BHA Board with emphasis and encouragement for a resident to apply is publicized in the local newspaper, sent to all residents in a special notice and discussed at the televised Commission meetings frequently before the deadline.

C. Statement of Consistency with the Consolidated Plan

For each applicable Consolidated Plan, make the following statement (copy questions as many times as necessary).

1. Consolidated Plan jurisdiction: State of Vermont
2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)
 - ☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
 - ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
 - ☐ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
 - ☐ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
 - ☐ Other: (list below)
4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

D. Other Information Required by HUD

Plan to address stated safety concern in the HUD resident survey: We will specifically discuss safety concerns in the three elderly developments where we are not operating targeted safety programs. We will address the safety question that was confusing to residents as we meet with them to discuss the survey just prior to its distribution.

Use this section to provide any additional information requested by HUD.

From Chapter 4

ESTABLISHING PREFERENCES AND MANAGING THE WAITING LIST

Brattleboro Housing Authority Admissions and Continued Occupancy Policy

Revised 5/28/99

Deconcentration . In accordance with the HUD mandate for deconcentration of lower incomes in higher income developments and higher incomes in lower income developments, the PHA will endeavor to maintain an income mix so that the overall income of each development is between 20 and 50% of median income.

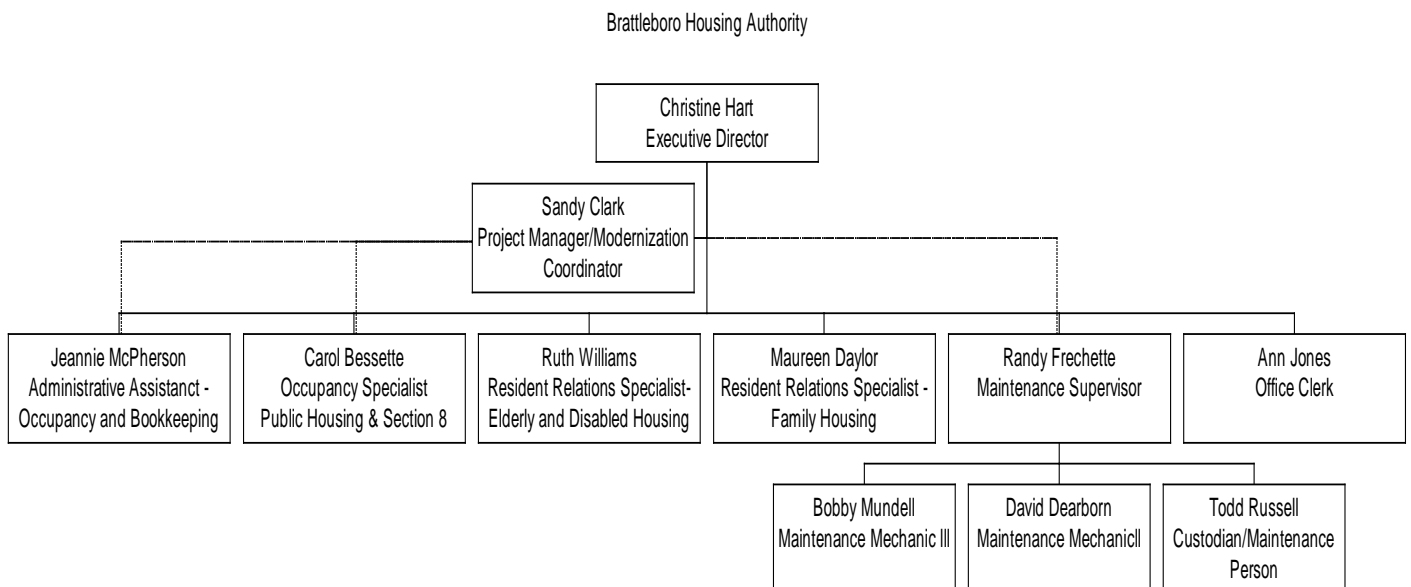
The PHA will not concentrate very low-income families in one development or one building within a development.

The PHA shall keep an on-going record of its admissions and annually review the income mix at each development

If necessary to achieve the required deconcentration and income targeting requirements, the BHA will use skipping of waiting list applicants. Skipping will be used on a limited basis and only when necessary.

Adopted by the Board of Commissioners June 28, 1999

Organizational Plan



Chapter 13

COMPLAINTS, GRIEVANCES AND APPEALS

Grievance and hearing procedures are available to applicants and participating families. The procedures for applicants are included in this chapter. The procedures for participating families (residents) are found in the separate policy document entitled "Brattleboro Housing Authority: Grievance Procedures". This policy is incorporated into this document by reference and is the guideline to be used for grievances and appeals for residents.

The informal and formal hearing requirements defined in HUD regulations and the Mansur Court Decree are found under the Notification and Appeal Procedure for Applicants for BHA housing. This Chapter describes the procedures to be used when applicants disagree with a BHA decision or fail to follow proscribed procedures including responding to BHA mail. It is the policy of the BHA to ensure that all families have the benefit of protections due to them under the law.

This Chapter also covers complaints and work orders.

A. COMPLAINTS and WORK ORDERS

The BHA will respond promptly to complaints from families, staff and the general public. Anonymous complaints are checked whenever possible. The BHA may require that complaints be put in writing. All staff are encouraged to use the form available for taking complaints over the phone. Every effort by staff is made to put complaints and all follow up information or action on them in writing. When appropriate, this information is put in the resident's file.

Work Orders

A complaint regarding physical condition of the units generates a Work Order for the Maintenance staff to respond. These complaints or any need for Maintenance to attend to something in a unit or within the Development should be reported immediately by calling the Main Office.

Other Complaints

Complaints from families. If a family disagrees with an action or inaction of the BHA, the complaint will be referred to the appropriate BHA staff person. The family should contact the Main Office to register their complaint.

Complaints from staff. If a staff person reports a family is violating or has violated a lease provision or is not complying with program rules, the staff person will refer the matter to the appropriate BHA staff person.

Complaints from the general public. Complaints or referrals from persons in the community in regard to the BHA or a family should be called into the Main Office where it will be referred to the appropriate BHA staff person.

B. NOTICE AND APPEAL PROCEDURE FOR APPLICANTS

There are two processes under the appeal procedures: The Informal Hearing Notification and Process and; The Notice of Denial of Admissions to Public Housing and Hearing Procedures.

1. The Informal Hearing Notification and Process

It is the intent of the informal hearing process to address and resolve all issues which may have a negative affect on the application or which have caused the Housing Authority to contact the applicant with a notification of an action which will affect the application. The purpose of the informal hearing is for the applicant and Housing Authority to work toward a resolution of these issues through a process of discussion. A more formal and legalistic hearing process is available for appeal of certain Housing Authority determinations and actions. See this Chapter: Formal Hearing Notification and Procedures.

The following actions make this procedure available to applicants:

Failure to respond to BHA request for information

A determination of ineligibility at the preapplication stage

Failure to follow the interview process requirements

A determination of ineligibility at the preliminary stage of the full application process

A determination of change(s) in eligibility

Denial of claimed preference

Removal from waiting list

When the applicant wishes to show good cause under the provisions of Chapter 4: Removal from the Waiting List and Purging; Notice of removal from waiting list.

When the BHA does not have an appropriate size and type of unit in its inventory.

a. Notification Process

In the event that any of the above actions occur, the BHA will inform the applicant of the action and what shall happen as a result of it. The BHA shall contact the applicant via first class mail sent to the most recent address given by the applicant.

In addition, the BHA shall follow the procedures below:

When an applicant initially applies, BHA will request that the applicant submit the addresses and phone numbers of two individuals whom BHA may contact in the future if BHA is unable to reach the applicant through mail sent to the applicant's current address. Submission of the two back-up names is not a requirement for applicants, but all applicants are encouraged to submit the information.

If first class mail sent to an applicant is returned to BHA as undeliverable (without a forwarding address or as incorrectly addressed), BHA will attempt to find a correct current address for the applicant by contacting the two individuals listed as back-up contacts at the time of the initial application. BHA will utilize both phone and first class mail in an effort to contact the applicant through any updated addresses supplied by the back-up contacts.

If, after following the procedures above, BHA is not successful in contacting the applicant, BHA may institute the actions specified in the letter.

See Chapter 4: Removal From Waiting List and Purging.

If an applicant does not respond to BHA within 14 days of contact via first class mail to the applicant's last known address, and the mailing is not returned, BHA will send notice of proposed action to the applicant and at least one of the back-up addresses if called for in the specific section of these Policies. See Chapter 4: Notice of removal from waiting list.

b. Content of Notification.

The notification shall contain:

- (1) the action to be taken and a complete statement of the factual basis for the action. There should be sufficient information for the applicant to present information concerning mitigating circumstances;
- (2) information on mitigating circumstances;
- (3) information on reasonable accommodations;
- (4) how the applicant requests an informal hearing to review the basis for the action;

c. Requesting and Scheduling the Informal Meeting.

The applicant has 10 days from receipt of the action letter to contact the Housing Authority to request a meeting. This request should be in writing but may be by telephone.

The Housing Authority shall schedule the informal hearing within five days of the request by the applicant. The informal hearing should be held within 14 days of the request by the applicant.

d. Representation and Prior Review of Documents

The applicant may be represented by another person or bring another person to assist them in the hearing.

The applicant and/or person assisting or representing them shall be able to review all the documents the Housing Authority relied on in determining the action to be taken.

e. At The Informal Hearing

(1) The informal hearing shall be conducted by the Executive Director or Administrative Coordinator. It is important that the BHA staff person conducting the hearing not be the person who made the determination of action or a subordinate of that person. The BHA will make every effort to have the person conducting the hearing have as little prior knowledge as possible regarding the application and applicant. Given this, there may be times when the Executive Director and Administrative Coordinator cannot conduct the hearing. In this case, the most senior staff person fitting the profile above will conduct the hearing.

(2) The applicant, their representative and Housing Authority staff person shall review all the material the Housing Authority relied on to make its determination of action.

(3) The applicant and/or their representative shall have ample opportunity to present any and all information he or she feels is important. They shall have ample opportunity to discuss mitigating circumstances or the need for a reasonable accommodation.

f. Conclusion of the Informal Hearing and Rendering a Decision.

It is the intent of this informal hearing to address and resolve all issues which may be affecting the application because of this more than one meeting may be necessary and additional information may need to be obtained. Every effort shall be made to come to a resolution in a timely manner. As a guideline, this step in the process should be completed within three weeks of the initial meeting.

Once all information has been received and the applicant and Housing Authority are satisfied that all the issues have been addressed, the Housing Authority staff person shall make a decision on the action under discussion. This shall be done within ten days of conclusion of the informal meeting process. The Housing Authority staff person shall notify the applicant in writing of the determination.

2. The Formal Hearing Notification And Process

The formal hearing process is available to applicants who are denied admission to public housing or wish to use this process for reinstatement for good cause.

a. Notification Process

Applicants being denied admission to public housing shall receive written notice of a proposed BHA decision to deny admission. BHA shall contact the applicant via first class mail sent to the most recent address given by the applicant.

When an applicant is removed from the waiting list for failure to respond to mail or because mail was undeliverable, the final notice of cancellation shall include a definition of good cause and the hearing procedures available.

b. Content of Notification.

The notification shall contain:

(1) a statement of the proposed denial and include a complete statement of the factual basis for the action. The statement of reasons for the denial shall be in sufficient detail to allow the applicant to present a defense at a hearing.

(2) a notice that the applicant may request a hearing to dispute the Housing Authority's decision by requesting a hearing in writing mailed within 20 days of the post-mark date of the notice of denial.

A form to be completed by the applicant to make a hearing request shall be included.

(2) when the reasons for denial are based only on prior conduct of the applicant, including: (a) past performance in meeting financial obligations; (b) a record of disturbance of neighbors, destruction of property, or living and housekeeping habits at prior residences; or (c) a history of criminal activity involving crimes of physical violence to persons or property, then the notice of proposed denial shall include a statement of the applicant's right to present evidence of mitigating circumstances and rehabilitation at the hearing. Further the notice shall inform the applicant that the BHA has a duty to consider, (a) evidence of rehabilitation; (b) evidence of the applicant family's participation in or willingness to participate in social service or other appropriate counseling service programs and the availability of such programs; (c) evidence of the applicant family's willingness to attempt to

increase family income and the availability of training or employment programs in the area.

(2) a statement of the applicant's rights under the Fair Housing Act Amendments, as implemented by 24 C. F. R. Section 100.200, et. seq. "It shall be unlawful for any person to refuse to make reasonable accommodations in rules, policies, practices or services, when such accommodations may be necessary to afford a person with a physical or mental disability an equal opportunity to have access to a public housing dwelling unit."

(5) a statement that the applicant has the right to request that the BHA make reasonable modifications in its procedures and standards for admissions to accommodate the disability. And that BHA will respond in writing to a reasonable accommodations request, informing the applicant of the BHA's decision and informing the applicant of the appeal rights available through BHA informal hearing procedures as well as under the Vermont Human Rights Commission and the U.S. Department of Housing and Urban Development's Fair Housing Office.

c. Requesting and Scheduling the Formal Hearing.

(1) The applicant shall mail their request for a hearing form to the BHA within 20 days of the post-mark date of the notice of denial.

(2) Within 5 working days of receipt of an applicant's request for a hearing, the BHA will provide notice to the applicant of the time, place and date of the hearing. The hearing date shall be not later than 14 days after the date of mailing of the notice of hearing.

d. Representation and Prior Review of Documents

(1) The applicant shall have the right to be represented by counsel or other representative at the hearing. The applicant shall have the right to be present at the hearing.

(2) Prior to the hearing, the applicant, or the applicant's authorized representative, shall have the opportunity to examine and copy all all documents, records, and regulations relied upon by the BHA for its decision.

(3) Any documents not made available to the applicant at least 2 working days prior to the hearing may not be relied upon by BHA at the hearing.

e. At The Hearing

(1) The BHA shall first produce evidence to support its proposed decision. the applicant will then be permitted to question witnesses whose testimony or information the BHA relied upon in making its initial

decision. The applicant will then have the opportunity to present witnesses and documents to support his or her position.

(2) The hearing shall be a private hearing, unless the applicant requests a public hearing.

(3) The hearing will be tape-recorded.

(4) The hearing officer will be a neutral individual, not employed or associated with BHA, such as an arbitrator associated with the American Arbitration Association. In the alternative, the applicant and the BHA may agree upon a hearing officer. If the BHA and the applicant cannot agree upon a hearing officer, the BHA and the applicant will each designate a hearing officer, and these two hearing officers will in turn select a third hearing officer. The decision will be made by majority vote of the three.

f. The Hearing Decision.

(1) The hearing decision will be in writing and mailed to the applicant and the applicant's representative, if any, within 5 working days of the hearing.

(2) The written decision shall be based solely on written and oral evidence presented at the hearing.

(3) The report of decision shall present an explanation of the basis for the decision.

(4) Unless BHA will suffer a concrete financial loss from retaining an available rental unit vacant pending a hearing decision, BHA will preserve any available unit for the applicant pending the hearing decision. If a unit must be rented during the pendency of a final hearing decision, and the applicant prevails, the applicant must be offered the next available equivalent unit 1/6/97 applicants will be promptly provided with a letter detailing their individual status, stating the reason for their ineligibility, and offering them an opportunity for an informal hearing.

g. Review of the Hearing Decision (public housing)

(1) Review of the hearing decision shall be pursuant to V.R.C.P. 75.

(2) Review of the hearing decision shall be limited to a determination of whether the hearing officer's findings and conclusions were arbitrary, capricious, an abuse of discretion, not in accordance with law, or unsupported by substantial evidence in the record as a whole.

C. APPEALS BY TENANTS

Grievances or appeals concerning the obligations of the tenant or the BHA under the provisions of the lease shall be processed and resolved in accordance with the Grievance Procedure of the BHA, which is in effect at the time such grievance or appeal arises.

* NOTE: Further information is provided in the BHA's Grievance Procedure.

The grievance procedures for Public Housing tenants do not apply to BHA determinations that affect applicants.

D. HEARING AND APPEAL PROVISIONS FOR "RESTRICTIONS ON ASSISTANCE TO NON-CITIZENS"

Assistance to the family may not be delayed, denied or terminated on the basis of immigration status at any time prior to the receipt of the decision on the INS appeal.

Assistance to a family may not be terminated or denied while the PHA hearing is pending but assistance to an applicant may be delayed pending the PHA hearing.

INS Determination of Ineligibility

If a family member claims to be an eligible immigrant and the INS SAVE system and manual search do not verify the claim, the PHA notifies the applicant or participant within ten days of their right to appeal to the INS within thirty days or to request an informal hearing with the PHA either in lieu of or subsequent to the INS appeal.

If the family appeals to the INS, they must give the PHA a copy of the appeal and proof of mailing or the PHA may proceed to deny or terminate. The time period to request an appeal may be extended by the PHA for good cause.

The request for a PHA hearing must be made within fourteen days of receipt of the notice offering the hearing or, if an appeal was made to the INS, within fourteen days of receipt of that notice.

After receipt of a request for an informal hearing, the hearing is conducted as described in the "Grievance Procedures" section of this chapter for both applicants and participants. If the hearing officer decides that the individual is not eligible, and there are no other eligible family members the PHA will:

- Deny the applicant family.

- Defer termination if the family is a participant and qualifies for deferral.

- Terminate the participant if the family does not qualify for deferral.

If there are eligible members in the family, the PHA will offer to prorate assistance or give the family the option to remove the ineligible members.

All other complaints related to eligible citizen/immigrant status:

If any family member fails to provide documentation or certification as required by the regulation, that member is treated as ineligible. If all family members fail to provide, the family will be denied or terminated for failure to provide.

Participants whose termination is carried out after temporary deferral may not request a hearing since they had an opportunity for a hearing prior to the termination.

Participants whose assistance is pro-rated (either based on their statement that some members are ineligible or due to failure to verify eligible immigration status for some members after exercising their appeal and hearing rights described above) are entitled to a hearing based on the right to a hearing regarding determinations of Tenant Rent and Total Tenant Payment.

Families denied or terminated for fraud in connection with the non-citizens rule are entitled to a review or hearing in the same way as terminations for any other type of fraud.

Revised 5/99

E. GRIEVANCE PROCEDURE

(Revised 5/99)

Purpose

In order to establish a vehicle for the just and effective settlement of the grievances of its tenants, the Brattleboro Housing Authority, hereinafter referred to as the "Authority," has adopted a grievance procedure, as more specifically set forth hereinafter.

(2) Applicability

- A.** *This grievance procedure shall be applicable to all individual grievances as defined in paragraph IIIA below, between the tenant and the Authority, and is the grievance procedure referred to in paragraph of the Dwelling Unit Lease used by the Authority. Each individual tenant's Dwelling Unit Lease shall be hereinafter referred to as his "lease."*

- A. *This grievance procedure is not applicable to disputes between tenants not involving the Authority or to class grievances. The grievance procedure is not intended as a form for initiating or negotiating policy changes between a group or groups of tenants and the Authority.*

I. Definitions

For the purpose of this grievance procedure, the following definitions are applicable:

- A. Grievance- *"Grievance" shall mean any dispute which a tenant may have with respect to the Authority's action or failure to act in accordance with the individual tenant's lease or the Authority's regulations which adversely affect the individual tenant's rights, duties, welfare or status.*

- A. Complainant- *"Complainant" shall mean any tenant whose grievance is presented to the Authority or at the project management office of the project in which the complainant resides in accordance with paragraph IV and VA below.*

- A. Elements of Due Process- *"Elements of Due Process" shall mean an eviction action or termination of the tenancy in a state or local court in which the following procedural safeguards are required:*

1. *Adequate notice to the tenant of the grounds for terminating the tenancy and for eviction;*
1. *Opportunity for the tenant to examine all relevant documents, records and regulations of the Authority prior to the trial for the purpose of preparing a defense;*
1. *Right of the tenant to be represented by counsel;*
1. *Opportunity for the tenant to refute the evidence presented by the Authority including the right to confront and cross examine witnesses and to present any affirmative legal equitable defense which the tenant may have;*

- A. Hearing Officer- *"Hearing Officer" shall mean a person selected to hear grievances and render a decision with respect thereto.*

- A. Hearing Panel- *"Hearing Panel" shall mean a panel selected to hear grievances and render a decision with respect thereto.*

- A. Masculine and Feminine Pronouns- *The masculine pronouns "he", "his"*

And "him" shall be deemed, where the context requires, to mean "she" and "her".

I. Informal Settlement of Grievance

Any grievance shall be personally presented, either orally or in writing, to the Authority at its principal office or to the project management office of the project in which the complainant resides, within Five (5) days after the occurrence giving rise to the grievance, so that the grievance may be discussed informally and an attempt can be made to settle the grievance without a hearing.

The Authority, acting through its Executive Director, shall at the time of presentation or within Five (5) business days after such presentation, informally discuss the grievance with the complainant or his representative. Within a reasonable time, not in excess of (5) days after presentation of the grievance, a summary of the informal discussion shall be prepared by the Authority, a copy shall be given to the tenant and one retained in the Authority's tenant file. The summary shall be in writing and shall specify the names of the participants in the discussion, the date of the discussion, the nature of the proposed disposition of the grievance and the specific reason thereof, and shall specify the procedures by which the complainant may obtain a hearing if he is not satisfied by the proposed disposition of the grievance.

V. Procedures To Obtain A Hearing

- A. Request for Hearing. *If the complainant is not satisfied with the results of the informal conference, the complainant shall submit a written request for a hearing to the Authority at its principal office no later than Five (5) days after the date complainant receives the summary of discussion pursuant to paragraph IV above.*

The written request shall specify:

- 1.** *The reason for the grievance*
- 2.** *The action or relief sought*

- A. Selection of Hearing Officer or Hearing Panel.

Grievances shall be presented before a hearing officer or hearing panel. A hearing officer or hearing panel shall be selected as follows:

- 1.** *The hearing officer shall be an impartial disinterested person
Selected jointly by the Authority and the complainant. If the Authority and the complainant cannot agree on a hearing officer, they shall each appoint a member as a hearing panel and the member so appointed shall select a third member. If the members appointed by the Authority and the complainant cannot agree on a third member, such a member shall be appointed by an independent arbitration organization such as the center for Dispute Settlement of the*

American Arbitration Association, or by the Authority and the complainant.

The Authority may provide for the appointment of a hearing officer or hearing panel by any method which is approved by the majority of tenants (in any building, group of buildings, or project, or group of projects to which the methods are applicable) voting in an election or meeting of tenants held for the purpose.

- A. *Failure to Request a Hearing.* *If a complainant does not request a hearing in accordance with paragraph A, of this section, the Authority's disposition of the grievance shall become final. Provided, that failure to request a hearing shall not constitute a waiver by the complainant of his right thereafter to contest the Authority's action in disposing of the complaint in an appropriate judicial proceeding.*
- A. *Hearing Prerequisite.* *All grievances shall be personally presented either orally or in writing pursuant to the informal procedure prescribed in paragraph IV as a condition precedent to a hearing under this section, Provided, that if the complainant shall show good cause why he failed to proceed in accordance with paragraph IV to the hearing officer or hearing panel, the provisions of this subsection may be waived by the hearing officer or hearing panel.*
- A. *Escrow Deposit.* *Before a hearing is scheduled in any grievance involving the amount of rent as defined in the tenant's lease which the Authority claims is due, the complainant shall pay to the Authority an amount equal to the total amount of the rent due and payable as of the first of the month preceding the month in which the act or failure to act took place. The complainant shall thereafter deposit his monthly rent in the escrow account each month until the complaint is resolved by decision of the hearing officer or hearing panel. The failure to make such payments shall result in a termination of the grievance procedure, Provided, that failure to make payment shall not constitute a waiver of any right the complainant may have to contest the Authority's disposition of his grievance in any appropriate judicial proceeding.*
- A. *Scheduling of Hearings.* *Upon complainant compliance with paragraph (a) (d) and (e) of this section, a hearing shall be scheduled by the hearing officer or hearing panel promptly for a time and place reasonably convenient to both the complainant and the Authority. A written notification specifying the time, place and procedures governing the hearing shall be delivered to the complainant and the Authority's Executive Director.*

VI. Procedures Governing the Hearing

- A. *The hearing shall be held before a hearing officer or hearing panel, as appropriate.*
- A. *The complainant shall be afforded a fair hearing provided the basic safeguards of due process which shall include:*

1. *The opportunity to examine before the hearing and, at the expense of the complainant, to copy all documents, records and regulations of the Authority that are relevant to the hearing. Any document not so made available after request thereof by the complainant may not be relied on by the Authority at the hearing;*
 1. *The right to be represented by counsel or other person chosen as his representative.*
 1. *The right to a private hearing unless the complainant requests a public hearing.*
 1. *The right to present evidence and arguments in support of his complaint, to controvert evidence relied on by the Authority, and to confront and cross-examine all witnesses on whose testimony or information the Authority relies;*
 1. *A decision based solely and exclusively upon the facts presented at the hearing.*
 - A. *The hearing officer or hearing panel may render a decision without proceeding with the hearing if the hearing officer or hearing panel determines that the issue has been previously decided in another proceeding.*
 - A. *If the complainant or the Authority fails to appear at a scheduled hearing, the hearing officer or hearing panel may make a determination to postpone the hearing for not to exceed five (5) business days or make a determination that the non-appearing party has waived his right to a hearing.*
- Both the complainant and the Authority shall be notified of the determination by the hearing officer or hearing panel, Provided, that a determination that the complainant has waived his right to a hearing shall not constitute a waiver of any right the complainant may have to contest the Authority's disposition of the grievance in an appropriate judicial proceeding.*
- A. *At the hearing the complainant must first make a showing of an entitlement to the relief sought and thereafter the Authority must sustain the burden of justifying its action of failure to act against which the complaint is directed.*
 - A. *The hearing shall be conducted informally by the hearing officer or hearing panel and oral or documentary evidence pertinent to the facts and issues raised by the complaint may be received without regard to admissibility under the rules of evidence applicable to judicial proceedings. The hearing officer or hearing panel shall require the Authority, the complainant, counsel and other participants or spectators to conduct themselves in an orderly fashion. Failure to comply with the directions of the hearing officer or hearing panel to obtain order may result in exclusion from the proceedings or in a decision adverse to the interests of the disorderly party and granting or denial of the relief sought, as appropriate.*

- A. *The complainant or the Authority may arrange, in advance and at the expense of the party making the arrangements, for a transcript of the hearing. Any interested party may purchase a copy of such transcript.*

VII. Decision of the Hearing Officer or Hearing Panel

- A. *The hearing officer or hearing panel shall prepare a written decision, together with the reasons therefor, within (10) working days after the hearing. A copy of the decision shall be sent to the complainant and the Authority. The Authority shall retain a copy of the decision, with all names and identifying reference deleted, shall also be maintained on file by the Authority and made available for inspection by a prospective complainant, his representative, or the hearing panel or hearing officer.*
- A. *The decision of the hearing officer or hearing panel shall be binding on the Authority, at a regular or special meeting thereof, determines within ten (10) working days and promptly notifies the complainant of its determination, that*
1. *The grievance does not concern Authority action of failure to act in accordance with or involving the complainant's lease or the Authority's regulations which adversely affect the complainant's rights, duties, welfare or status;*
 1. *The decision of the hearing officer or hearing panel is contrary to applicable Federal, State or local law, HUD regulations or requirements of the annual contributions contract between HUD and the Authority*
 2. *A decision by the hearing officer, hearing panel, or the Authority in favor of the Authority or which denies the relief requested by the complainant in whole or in part shall not constitute a waiver of nor affect in any manner whatever, any rights the complainant may have to a trial de novo or judicial review in any judicial proceedings, which may thereafter be brought in the matter.*

VIII. Authority Eviction Actions

If a tenant has requested a hearing in accordance with paragraph V on a complaint involving an Authority notice of termination of the tenancy and the hearing officer or hearing panel upholds the Authority's to terminate the tenancy, the Authority shall not commence an eviction action in a State or local court until it has served a notice to vacate on the tenant, and in no event shall the notice to vacate be issued prior to the decision of the hearing officer or the hearing panel having been mailed or delivered to the complainant. Such notice to vacate must be in writing and specify that if the tenant fails to quit the premises within the applicable statutory period, or on the termination date stated in the notice of termination, whichever is later, appropriate action will be brought against him and he may be required to pay court costs and attorney fees.

